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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Johnny Wheatcroft and Anya Chapman, as husband and wife, and on behalf of minors J.W. and B.W.,

NO. 2:18-cv-02347-SMB

JOINT MOTION FOR PROTECTIVE ORDER

Plaintiffs,

V.

City of Glendale, a municipal entity; Matt Schneider, in his official and individual capacities; Mark Lindsey, in his official and individual capacities; and Michael Fernandez, in his official and individual capacities,

Defendants.

The parties jointly move for a Protective Order since the City of Glendale, Matt Schneider, Mark Lindsey and Michael Lindsey (collectively “Defendants”) will produce certain items, information, and documents that contain the identity of a police officer who is the complainant in an internal workplace harassment complaint within the Glendale Police Department (“Officer”). The parties agree that the Officer’s identity shall remain confidential and not available for dissemination to the general public, including the media, but instead shall remain confidential, known by and shared only with this Court and its staff, the parties, their respective attorneys, representatives, agents, consultants, and experts involved in this lawsuit, and any trial witness or deponent during the course of their testimony. The documents containing the Officer’s identity include disciplinary memos, audio recorded interviews and transcripts of interviews, complaint reports,

1 complaints, allegations summaries, Notices of Investigation, and an event timeline related
2 to Complaint No. 2017-055 (“Confidential Items”).

3 Due to the nature of these Confidential Items and pursuant to their
4 agreement, the parties jointly request that the Court enter the attached proposed Protective
5 Order, which sets forth the procedure for the handling of such confidential information
6 during the course of this litigation. The parties have agreed to the terms set forth in the
7 proposed Protective Order.

8 DATED this 20 day of May 2019.
9

10 ATTORNEYS FOR FREEDOM

JONES, SKELTON & HOCHULI, P.L.C.

11 By /s/ Jody L. Broaddus (with permission)
12 Marc J. Victor
13 Jody L. Broaddus
13 3185 S. Price Rd.
14 Chandler, Arizona 85248
14 Attorneys for Plaintiffs

By /s/ Joseph J. Popolizio
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Justin M. Ackerman
40 North Central Avenue, Suite 2700
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Attorneys for Defendants

15 **CERTIFICATE OF SERVICE**

16 I hereby certify that on this 20th day of May 2019, I caused the foregoing
17 document to be filed electronically with the Clerk of Court through the CM/ECF System
18 for filing; and served on counsel of record via the Court’s CM/ECF system.
19

20 I further certify that on 20th day of May 2019, I have served the forgoing
21 documents to the following:

22 Marc J. Victor
23 Jody L. Broaddus
23 Attorneys for Freedom
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24 Chandler, Arizona 85248
25 Marc@AttorneyForFreedom.com
25 Jody@AttorneyForFreedom.com
26 Attorneys for Plaintiffs

27 /s/Melissa Ward